

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants:	Fabio Casati, et al.	§	Art Unit:	2153
		§		
Serial No.:	10/066,098	§	Examiner:	Lashanya Renee Nash
		§		
Filed:	January 31, 2002	§		
		§		
For:	Dynamic Conversation Logic	§	Atty. Dkt. No.:	10010118-1
	Selection Method and System	§		(HPC.0311US)
		§		

**Mail Stop Appeal Brief-Patents**

Commissioner for Patents

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**REPLY BRIEF**

Sir:

The following sets forth Appellant's Reply to the Examiner's Answer dated June 17, 2011.

**A. REPLY TO EXAMINER'S ANSWER REGARDING THE § 103 REJECTION OF CLAIMS 1, 27 OVER KUNO AND STEWART**

Independent claim 1 recites a method for selecting a conversation logic at run-time for a workflow definition that includes at least one node with no hard-coded conversation logic, comprising:

- a) maintaining a conversation logic repository that includes plural conversation logic, wherein each of the plural conversation logic is external to the workflow definition, and wherein each of the plural conversation logic specifies a corresponding set of operations to be performed on a respective service;
- b) when executing the node with no hard-coded conversation logic, dynamically discovering, by a computer, a service associated with the node with no hard-coded conversation logic, wherein the discovered service is selected from among plural services;
- c) selecting one of the plural conversation logic in the conversation logic repository based on the discovered service; and

d) dynamically plugging in the determined selected conversation logic into the node at run time in the computer, wherein the run time is a time during which the node with no hard-coded conversation logic is being executed.

As explained in the Appeal Brief, Stewart clearly provides no teaching or hint of claimed subject matter conceded by the Examiner to be missing from Kuno. The Examiner conceded that Kuno fails to disclose clause d) of claim 1 set forth above. 10/27/2010 Office Action at 4; Examiner's Answer at 6-7. Instead, the Examiner cited Stewart as purportedly disclosing the claimed subject matter. 10/27/2010 Office Action at 4-5; Examiner's Answer at 7. Specifically, the Examiner cited the following passages of Stewart: column 19, line 19 – column 20, line 54; column 10, lines 20-31. *Id.* However, as explained in the Appeal Brief, Stewart clearly does not provide any teaching or hint of the claimed subject matter as alleged by the Examiner.

The Response to Arguments section of the Examiner's Answer argued that Appellant has attacked "the Stewart reference individually." Examiner's Answer at 18. This characterization of Appellant's arguments is incorrect, as Appellant was specifically rebutting allegations made by the Examiner regarding the teachings of Stewart. Specifically, the Appeal Brief pointed out deficiencies in the Examiner's express statements made with respect to Stewart.

The Response to Arguments section does concede that Stewart does not disclose a workflow definition as recited in claim 1. *Id.* at 17. According to the Examiner, "Stewart is not cited to teach the workflow definition." *Id.* Rather, the Examiner argued that "Stewart is cited for teaching dynamically plugging in conversation logic into the node at runtime in the computer." *Id.* at 17-18. This allegation ignores the fact that claim 1 specifically calls for dynamically plugging in the determined selected conversation logic into the node, that is included in the **workflow definition**, at runtime in the computer. By ignoring express words of the claim in arguing that Stewart discloses claimed subject matter conceded to be missing from the primary reference, Kuno, it is clear that the Examiner has committed error in the rejection.

The Examiner further cited column 17, line 50 – column 20, line 17, of Stewart as supporting the rejection. *Id.* at 18. As explained by Stewart, logic plug-ins allow a c-space owner to add unique functionality to a c-space. Stewart, 19:61-63. As explained in Stewart, “c-space” refers to a collaboration space. *Id.*, 14:53. The c-space is an abstraction supporting a single business model, business message protocols, a secure message space, security policies, quality of service policies, and a registered set of business trading partners. *Id.*, 14:56-60. However, it is clear that the collaboration space, in which trading partners are able to collaborate, does not constitute a workflow definition as recited in claim 1. Note that, according to claim 1, each of the plural conversation logic is external to the workflow definition. Thus, claim 1 makes clear that the workflow definition is distinct and separate from the plural conversation logic. Thus, to the extent that the collaboration space of Stewart is considered to implement conversations between trading partners, it is clear that the collaboration space of Stewart cannot be the workflow definition of claim 1. Thus, adding logic plug-ins to the collaboration space of Stewart does not provide any hint of dynamically plugging in a selected conversation logic into the node of a workflow definition at runtime.

In fact, the Response to Arguments section of the Examiner’s Answer pointed to a passage of Kuno that specifically supports the Appellant’s arguments above. In the Response to Arguments section, the Examiner cited the following passage of Kuno: § 5, Related Work, p. 12, ¶ 4. Examiner’s Answer at 18. This passage of Kuno states that “workflows and conversations serve different purposes.” Kuno, § 5, related work, page 12, ¶ 4. “Conversations reflect the interactions between services, whereas workflows delineate the work done by a service.” *Id.* Thus, it is clear that adding logic plug-ins to the collaboration space of Stewart, which provides

conversations between trading partners, does not provide any hint of dynamically plugging in a selected conversation logic into the node of a workflow definition at runtime, as claimed.

The Response to Arguments section of the Examiner's Answer further argued that Stewart teaches that logic plug-ins are employed at plug-in points. Examiner's Answer at 18. Note, however, that claim 1 does not recite plugging in logic in general—rather, claim 1 recites dynamically plugging in the determined selected conversation logic into the node of a **workflow definition** at runtime in the computer.

Therefore, it is clear that the asserted combination of Kuno and Stewart would not have led to the claimed subject matter.

In view of the foregoing and in view of the reasons provided in the Appeal Brief, it is clear that the foregoing claims are non-obvious over Kuno and Stewart.

## **B. CONCLUSION**

In view of the foregoing, and in view of the arguments presented in the Appeal Brief, reversal of the final rejections is respectfully requested.

Respectfully submitted,

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/Dan C. Hu/

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